

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) Case No. 22-03027-01-CR-S-BP
)
 NATHAN MAHAFFEY,)
)
 Defendant.)

Comes now Defendant, by counsel Scott McBride, and moves this Court, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), to remove this case from the scheduled trial docket and to continue this case until the August 22, 2022, trial docket.

1. Defendant is currently detained awaiting trial.
2. James J. Kelleher, Assistant United States Attorney, does not oppose this request.
3. This continuance is not sought for purpose of unnecessary delay, but is sought in truth and fact so that the Defendant may fully investigate the case, review all discovery, and adequately prepare for trial.
4. In accordance with 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), it is submitted, that the ends of justice served by the continuance outweigh the best interests of the public and the Defendant to a speedy trial, which is required by 18 U.S.C. § 3161(c)(1). Under the provisions of 18 U.S.C. § 3161(h)(7)(A), the period of time until the requested criminal trial docket setting should be excluded in computing the period of time in which the Defendant should be brought to trial under the provisions of the Speedy Trial Act.

WHEREFORE, Defendant, respectfully requests this Court, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) to continue this case until the August 22, 2022, trial docket, or to any other subsequent date which this Court deems appropriate.

Respectfully Submitted,

**THOMAS, BIRDSONG, MILLS,
MCBRIDE & OSBORNE, P.C.**

By /s/Scott T. McBride
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March, 2022, I electronically filed the foregoing with the clerk of the court using the CM/ECF system, which sent notification of such filing to the following:

James J. Kelleher
Assistant U.S. Attorney
United States Attorney's Office

/s/Scott T. McBride
Scott T. McBride